

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**FUNDAMENTAL INNOVATION  
SYSTEMS INTERNATIONAL, LLC,**

**Plaintiff**

**v.**

**ZTE CORPORATION et al.**

**Defendants.**

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**Civil Action No. 3:17-cv-1827-N**

**DECLARATION OF JAMES RAY WOOD IN SUPPORT OF  
DEFENDANT’S MOTION TO DISMISS FOR IMPROPER SERVICE**

I, James Ray Wood, state and declare as follows:

1. I am of legal age and competent to testify as to the matters set forth herein. The statements set forth in this declaration are true and correct to the best of my knowledge and belief.
2. I am the Chief Patent Counsel of defendant ZTE (USA), Inc. (hereinafter “ZTE USA”). I am an employee of ZTE USA.
3. ZTE USA is a U.S.-based corporation incorporated in New Jersey. ZTE USA’s domestic headquarters are in Richardson, Texas where it employs more than 140 people. ZTE USA has an independent Human Resources department.
4. ZTE USA is a wholly owned subsidiary of ZTE Corporation, a Shenzhen, China based telecommunication company.
5. ZTE USA is not authorized to accept service on behalf of ZTE Corporation.
6. ZTE USA and ZTE Corporation maintain separate corporate Boards, each with its own set of corporate officers. The companies also operate under separate by-laws.

7. ZTE USA and ZTE Corporation maintain separate accounting systems and separately report revenues and costs.

8. ZTE USA and ZTE Corporation engage in related business activities. ZTE USA makes its own operational decisions with advice from ZTE Corporation as appropriate given ZTE Corporation's role as the primary developer and manufacturer of the products ZTE USA imports, markets, and sells in the United States, the history of the corporate relationship, and each company's respective business activities and objectives.

9. I declare under penalty of perjury under the laws of the United States of America, that the foregoing facts are true and correct based on my own personal knowledge. Executed on August 18, 2017.

  
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JAMES RAY WOOD